

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MIKUL KLEHM,
Plaintiff,

V.

RAWLTYN JORDAN HART, et al.,
Defendants.

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CIVIL ACTION NO. 4:22-CV-01226

HON. CHARLES ESKRIDGE

JURY DEMANDED

DEFENDANT HARRIS COUNTY'S INITIAL DISCLOSURES

To: Mikul Klehm, through his attorneys of record, David Bleakney and Benjamin Campagna, 100 N. Velasco, Angleton, TX 77515.

In accordance with Federal Rule of Civil Procedure 26(a), Defendant Harris County provides the following information:

A. Persons Likely to Have Discoverable Information that May be Used to Support Claims or Defenses (Rule 26(a)(1)(A)(i)):

- Mikul Klehm, c/o David Bleakney, 100 N. Velasco, Angleton, Texas (281-815-0387). Plaintiff who is expected to testify about his injuries and damages that resulted from the incident with Deputy Hart.
- Deputy Rawltyrn Hart, c/o Ramon G. Viada III, 17 Swallow Tail Court, The Woodlands, Texas 77381 (281) 419-6338. Defendant who is expected to testify about his background, education, training, employment history, job duties and responsibilities with the HCSO, authority of police officers to act in various situations, as well as his actions and participation in the events at issue in this lawsuit. He will testify consistent with his sworn statements and deposition.
- Angela Marie Halstead, 5330 Rivergate Drive, Spring, Texas 77373 or 1200 N. Loop 336 W, Apt. 132, Conroe, Texas. Driver of the vehicle Klehm was in while Deputy Hart was in pursuit. She may have witnessed the incident.
- Phillip Earl Jameson, 23936 Killerbee Lane, New Caney, Texas 77357 (936) 286-7597. May have knowledge of the events at issue in this lawsuit.

- Austin Jameson, Jr., 23936 Killerbee Lane, New Caney, Texas 77357 (281) 806-6262. May have knowledge of the events at issue in this lawsuit.
- Juan J. Hernandez, 8609 Meta #D, Houston, Texas, (713) 257-5454. May have knowledge of the events at issue in this lawsuit.
- Rogenia Balmain Gallow, 554 Beaver Bend Rd., Houston, Texas 77037 (832) 286-4062. May have knowledge of the events at issue in this lawsuit.
- Ana C. Martinez, 551 Beaver Bend Rd., Houston, Texas 77037 (281) 820-6289. May have knowledge of the events at issue in this lawsuit.
- Rosalina Gonzalez, 543 Beaver Bend Rd., Houston, Texas 77037 (346) 781-2850. May have knowledge of the events at issue in this lawsuit.
- Mireya Ruiz Plancarte, 539 Beaver Bend Rd., Houston, Texas 77037 (281) 706-1439. May have knowledge of the events at issue in this lawsuit.
- Primitivo Trujillo, 566 Beaver Bend Rd., Houston, Texas 77037 (832) 559-8675. May have knowledge of the events at issue in this lawsuit.
- Dante Gustavo Ovalle Ramirez, 555 Beaver Bend Rd., Houston, Texas 77037 (832) 490-9653. May have knowledge of the events at issue in this lawsuit.
- Karla Davila, 558 Beaver Bend Rd., Houston, Texas 77037 (832) 705-4255. May have knowledge of the events at issue in this lawsuit.
- Crystal Smith, 1200 North Loop 336 W. Apartment # 131, Houston, Texas (phone number unknown). May have knowledge of the events at issue in this lawsuit.
- Steven Rodriguez, 546 Beaver Bend Rd., Houston, Texas (phone number unknown). May have knowledge of the events at issue in this lawsuit.
- Rogina Galow, 554 Beaver Bend Rd., Houston, Texas (phone number unknown). May have knowledge of the events at issue in this lawsuit.
- Stan Jolly, Montgomery County Sheriff's Office Specialist, #1 Criminal Justice Dr., Conroe, Texas 77301 (936) 760-5800. May have knowledge regarding attempt to contact Angela Halsted after the incident.
- Registered Nurse L. Brumlow, Registered Nurse DJordjeric, Registered Nurse Samantha E., Dr. F. Khan, Dr. L. Blackburn, Charge Nurse Laura Crockett,

Registered Nurse B. Reed, Chief Trauma Surgeon L. Blackbourne and unknown staff, employees, representatives, agents, personnel and custodian of records for HCA Houston Healthcare Northwest Hospital, 710 Cypress Creek Pkwy, Houston, Texas 77090 (281-440-1000). May have knowledge of Plaintiff's medical condition and injuries at the time in question.

- Unknown staff, employees, representatives, agents, personnel and custodian of records for Harris County Emergency Corps, Emergency Medical Services, Medic #96, 2800 Aldine Bender Rd., Houston, Texas 77032, (281) 49-3131. May have knowledge of Plaintiff's medical condition and injuries at the time in question.

All of the below listed individuals are uniformed personnel or civilian employees of the Harris County, and pursuant to Chapter 552 *et seq.*, Texas Government Code, the home address, home telephone numbers, personal identifying information and information on family members will not be disclosed. See Tex. Gov't Code §§552.102, 552.117, 552.1175, & 557.108(a)(2). Arrangements to either contact or take depositions of any of the below listed individuals should be made by contacting the attorney designated by name of each Harris County employee listed below.

- Baker, J. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Benavides, Amanda, Harris County District Attorney's Office, Criminal Justice Center, 1201 Franklin, Suite 600, Houston, Texas 77002-1901 (c/o Laura Hedge: 713-274-5137). May have knowledge of the criminal investigation and prosecutorial review of the events at issue in this lawsuit.
- Boehm, M.A. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO supervisor who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Bunevich, J.A. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or

involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.

- Cantu, M. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Carter, K.C. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Chenier, P. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Conner, Mark, L. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO High Tech Crime Unit technician who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Cox, L.D. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO supervisor who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Daniels, K. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or

involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.

- Davis, T. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Crime Scene Investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- De LaTorre, A. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Crime Scene Unit Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- DellaSala, D. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Crime Scene Unit Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Drummer, E. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Transportation Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Duran, C. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Edmond, L. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or

involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.

- Foos, Preston, HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO- Incident Report #2004-04396 and administrative investigation under HCSO-IAD File #2022-159.
- Garcia, D. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Garcia, Francisco HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Gonzales, Ed, HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Sheriff for HCSO who may testify about his background, education, training, employment history, job duties and responsibilities as HCSO Sheriff, authority of peace officers to act in various situations, as well as his knowledge, if any, of the criminal investigation relating to HCSO-Incident Report #2004-04396 and the administrative investigation under HCSO-IAD File #2022-159. He may offer opinions regarding the actions of Deputy Hart at the time in question. He may offer opinions that HCSO does not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including the Plaintiff. He may offer an opinion that no policy, custom or practice of Harris County was the moving force behind nor the actual cause of the Plaintiff's alleged injuries and that the training, supervision and discipline of HCSO deputies is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.
- Gonzalez, E. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or

involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.

- Guerrero, V. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Hayes, Timothy D. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Henneke, B. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Hernandez, J.C. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Hernandez, J.J. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Herndon, Jennifer, HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Major who may testify about her background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as her knowledge, if any, of the criminal investigation relating to HCSO-Incident Report #2004-04396 and the

administrative investigation under HCSO-IAD File #2022-159. She may offer opinions regarding the actions of Deputy Hart at the time in question. She may offer opinions that HCSO does not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including the Plaintiff. She may offer an opinion that no policy, custom or practice of Harris County was the moving force behind nor the actual cause of the Plaintiff's alleged injuries and that the training, supervision and discipline of HCSO deputies is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

- Huynh, Tony, HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO major who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge, if any, of the criminal investigation relating to HCSO-Incident Report #2004-04396. He may offer opinions regarding the actions of Deputy Hart at the time in question. He may offer opinions that HCSO does not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including the Plaintiff. He may offer an opinion that no policy, custom or practice of Harris County was the moving force behind nor the actual cause of the Plaintiff's alleged injuries and that the training, supervision and discipline of HCSO deputies is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.
- Jaimes, L. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Jan, A. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Johnson, Jules, Harris County District Attorney's Office, Criminal Justice Center, 1201 Franklin, Suite 600, Houston, Texas 77002-1901 (c/o Laura Hedge: 713-274-5137). May have knowledge of the criminal investigation and prosecutorial review of the events at issue in this lawsuit.

- Kelly, B. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- King, Andrew HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Crime Scene Investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Kuhlman, Wendall, HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO major who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge, if any, of the criminal investigation relating to HCSO-Incident Report #2004-04396. He may offer opinions regarding the actions of Deputy Hart at the time in question. He may offer opinions that HCSO does not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including the Plaintiff. He may offer an opinion that no policy, custom or practice of Harris County was the moving force behind nor the actual cause of the Plaintiff's alleged injuries and that the training, supervision and discipline of HCSO deputies is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.
- Leitner, Jim, Harris County District Attorney's Office, Criminal Justice Center, 1201 Franklin, Suite 600, Houston, Texas 77002-1901 (c/o Laura Hedge: 713-274-5137). May have knowledge of the criminal investigation and prosecutorial review of the events at issue in this lawsuit.
- Love, G.T. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Mabery, J.A. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO supervisor who may testify about his background, education,

training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.

- Manchaca, A. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Crime Scene Investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Martinez, M. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Martinez, Ruben HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- McGee, Christine, HCSO, 1200 Baker Street, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). A custodian of records for HCSO who is expected to testify that HCSO Incident Report #2004-04396 and HCSO IAD file #2022-159, including but not limited to all reports, supplemental reports, witness statements, investigation supplements, videos, audio recordings, medical reports, medical notes and all other records, documents or media contained in said files are business records and records of regularly conducted activity within the meaning of the Federal Rules of Evidence.
- Menchaca, A. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.

- Menchaca, M. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Millan, Billy, Harris County District Attorney's Office, Criminal Justice Center, 1201 Franklin, Suite 600, Houston, Texas 77002-1901 (c/o Laura Hedge: 713-274-5137). May have knowledge of the criminal investigation and prosecutorial review of the events at issue in this lawsuit.
- Miller, Sidney HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Minchew, R. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Lt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Munoz, Freder HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Homicide Investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Nelson, Rolf, HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO major who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge, if any, of the criminal investigation relating to HCSO-Incident Report #2004-04396. He may offer opinions regarding the actions of Deputy Hart at the time in question. He may offer opinions that HCSO does not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including the Plaintiff. He may offer an opinion that no policy, custom or practice of Harris County was the moving force behind nor the actual cause of the Plaintiff's alleged injuries and that the training, supervision and discipline of HCSO deputies is

constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.

- Ortiz, J. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Parojcic, Nickolas A. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Pinkins, Gregory D. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Sgt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Sampson, J.D. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Sanchez, J. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Shield, Robert HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Lt. who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace

officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.

- Suarez, Saul, HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO major who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge, if any, of the criminal investigation relating to HCSO-Incident Report #2004-04396. He may offer opinions regarding the actions of Deputy Hart at the time in question. He may offer opinions that HCSO does not maintain a custom, policy or practice of conscience, deliberate indifference to the citizens of Harris County, including the Plaintiff. He may offer an opinion that no policy, custom or practice of Harris County was the moving force behind nor the actual cause of the Plaintiff's alleged injuries and that the training, supervision and discipline of HCSO deputies is constitutionally sufficient, and that no alleged lack of training, supervision or discipline was the moving force behind any of Plaintiff's alleged injuries.
- Sustaita, J. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Taylor, K.R. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Thomas, D., HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Thomas, J., HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or

involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.

- Tinnin, Dean HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Crime Scene Investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Tunello, D., HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO Investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Vickery, Jeffrey, HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). HCSO IAD Investigator who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396 and administrative investigation under HCSO-IAD File #2022-159.
- Ybarra, L. HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Zavalla, Alfredo HCSO, 1200 Baker, Houston, Texas 77002 (c/o Laura Hedge: 713-274-5137). Deputy with HCSO who may testify about his background, education, training, employment history, job duties and responsibilities with HCSO, authority of peace officers to act in various situations, as well as his knowledge and/or involvement with the criminal investigation relating to HCSO-Incident Report #2004-04396.
- Unknown staff, employees, representatives, agents, personnel and custodian of records for Harris County District Attorney's Office, Criminal Justice Center, 1201 Franklin, Suite 600, Houston, Texas 77002-1901 (c/o Laura Hedge: 713-274-

5137). May have knowledge of the criminal investigation and prosecutorial review of the events at issue in this lawsuit.

B. Documents That Support Claims or Defenses (Rule 26(a)(1)(A)(ii)):

1. Documents containing Harris County Sheriff's Office policies and procedures, training documents, incident report & supplements, audio and written statements, dash cam video & video of scene, photographs, TCOLE training records, IAD report, and no bill letter from District Attorney. The HCSO is the custodian of these records.
2. Documents concerning criminal history and court records of Mikul Klehm and Plaintiffs' allegations that are the subject of this litigation.

C. Calculation of each damage claims (Rule 26(a)(1)(A)(iii)):

Other than attorney fees and costs, Harris County is not seeking damages in this action. Harris County, however, would object to the use of this disclosure to the extent that Plaintiff may seek to use it to place the burden of proving the amount of Plaintiff's damages upon Harris County or may use this disclosure to prove Plaintiff's damages when such disclosure is based on work product and does not constitute admissible evidence.

D. Insurance agreements (Rule 26(a)(1)(A)(iv)):

There are no insurance agreements on behalf of Harris County that would satisfy part or all of any judgment that may be entered in this case. Harris County also does not indemnify its employees.

There are no insurance agreements on behalf of Deputy Hart that would satisfy part of all of any judgment that may be entered in this case.

E. Expert Disclosures (Rule 26(a)(2)):

Harris County will timely disclose its experts in accordance with the Court's Scheduling Order.

Date: April 11, 2023

OF COUNSEL:

Christian D. Menefee

Respectfully submitted,

/s/ Laura Beckman Hedge
LAURA BECKMAN HEDGE
Sr. Assistant County Attorney
ATTORNEY-IN-CHARGE

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**ATTORNEYS FOR DEFENDANT
HARRIS COUNTY**

Certificate of Service

I hereby certify that on April 11, 2023, a true and correct copy of the foregoing was served pursuant to the Federal Rules of Civil Procedure to:

DAVID BLEAKNEY
BENJAMIN CAMPAGNA
100 N. Velasco
Angleton, TX 77515

RAMÓN G. VIADA III
17 Swallow Tail Court
The Woodlands, TX 77381

/s/ Laura Beckman Hedge
LAURA BECKMAN HEDGE